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July 5, 2019

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Proceedings Related to the South Carolina Energy Freedom Act (House Bill 3659, 2019 Act No. 62); Docket Nos. 2019-176-E, 2019-180-E, 2019-182-E, 2019-184-E, 2019-197-E, 2019-209-E, 2019-212-E, 2019-226-E, and ND-2019-11-E

Dear Ms. Boyd:

On behalf of Dominion Energy South Carolina, Inc. ("DESC"), I am writing in response to Order No. 2019-457, issued on June 26, 2019, in Docket Nos. 2019-176-E and 2019-184-E, and the Commission Directive, dated June 26, 2019, in Docket No. ND-2019-11-E. Specifically, in Order No. 2019-457, the Public Service Commission of South Carolina ("Commission") directed the parties and other interested persons to file comments by July 5, 2019, regarding Johnson Development Associates, Inc. ("JDA") and the South Carolina Solar Business Alliance, Inc.'s ("SCSBA") Petition to Set a Consolidated Schedule ("Petition") and other scheduling issues. And, by Directive dated July 26, 2019, the Commission solicited comments from all parties regarding the scheduling procedure for standard offer and avoided cost issues, community solar issues, voluntary renewable energy programs, review of interconnection standards, review of net energy metering ("NEM") and NEM methodology, and the integrated resource plan ("IRP") process.

As an initial matter, at the Commission Advisory Committee Meeting on June 14, 2019, DESC provided a proposed schedule, including recommended pre-filing testimony and hearing dates, for all Commission proceedings required under the South Carolina Energy Freedom Act ("Act 62"). A copy of the proposal has been provided to those parties and other interested persons in attendance. Commission Staff provided the Commission with a copy of the proposed DESC schedule at the Commission's agenda meeting on June 26, 2019. DESC will address each docket in turn.

The Honorable Jocelyn G. Boyd
 July 5, 2019
 Page 2

**Standard Offer, Avoided Cost Methodologies, Form Contract Power
 Purchase Agreements, Commitment to Sell Forms, and Any Other Terms
 or Conditions Necessary
 (Docket Nos. 2019-176-E and 2019-184-E)**

By way of a letter dated June 17, 2019, and again in its June 24, 2019, Response in Opposition, DESC asserted that the Petition filed by JDA and SCSBA should be denied and that Docket No. 2019-176-E should be administratively closed. For the same reasons set forth therein,¹ DESC asserts that establishing a consolidated procedural schedule in Docket No. 2019-176-E is both unnecessary and unwarranted and, if granted, would only serve to create confusion and unduly burden the limited administrative resources of the Commission and the parties. Consistent with the plain language of Act 62, DESC believes that these issues should be addressed entirely within the DESC-specific Docket No. 2019-184-E. See S.C. Code Ann. § 58-41-20(A) (providing that the Commission “shall open **a docket for** the purpose of establishing **each electrical utility’s** standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and any other terms or conditions necessary to implement” the requirements of this section and that the Commission shall, within six months after the effective date of Act 62, approve “**each electrical utility’s** standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and any other terms or conditions necessary to implement” the requirements of this section (emphasis added)).

Other Scheduling Issues

**Review of Community Solar Programs
 (Docket Nos. 2019-180-E and 2019-212-E)**

The Commission opened Docket No. 2019-180-E, a generic docket, and subsequently established Docket No. 2019-212-E, which is specific to the review of DESC’s Community Solar programs. With the establishment of Docket No. 2019-212-E for DESC, Docket No. 2019-180-E is no longer needed and should be administratively closed.

By letter dated June 18, 2019, the Commission established a July 18, 2019, deadline for DESC to file with the Commission in Docket No. 2019-212-E its report as required by S.C. Code Ann. § 58-41-40(B)(1). DESC has no objection to the July 18, 2019 date established by the Commission for Docket No. 2019-212-E.

¹ DESC incorporates herein by reference its letter dated June 17, 2019, and its Response in Opposition to JDA and SCSBA’s Joint Petition to Set Consolidated Schedule.

Voluntary Renewable Energy Program (Docket No. 2019-209-E)

DESC is statutorily required to file its proposed Voluntary Renewable Energy Program no later than September 13, 2019. Although DESC tentatively identified a hearing date as part of its proposed schedule, Act 62 does not specifically require a live hearing in this matter.

Review of Interconnection Standards (Docket No. 2019-197-E)

Action in this docket for review of interconnection standards does not need to occur any earlier than 2020. In order to ensure that the standards are designed to address issues with the interconnection queue, the Commission should first issue a final order addressing the issues in Docket No. 2019-184-E and establish the avoided cost rate for DESC before taking any action regarding interconnection standards.

Review of NEM and NEM Methodology (Docket No. 2019-182-E)

Action in this docket for review of NEM and NEM Methodology need not occur prior to January 2021. Under Act 62, customers who apply for NEM prior to June 1, 2021, may continue NEM service as provided in Commission Order No. 2015-194 until May 31, 2029. Scheduling further action in Docket No. 2019-182-E to start no earlier than 2021 will allow sufficient notice and opportunity for public comment and public hearing for the Commission to establish a “solar choice metering tariff” to go into effect for applications received after May 31, 2021, as provided for in Act 62, while also providing the Commission and parties the necessary time to address other pressing issues provided for in Act 62 as well as other annual business.

Integrated Resource Plan (Docket No. 2019-226-E)

With respect to IRPs, DESC continues to assert its position as set forth in its letter dated June 17, 2019, in Docket No. 2019-226-E. DESC intends to follow its historical practice to update its IRP in February of each year, and proposes to file an updated IRP in compliance with the requirements of the newly enacted S.C. Code Ann. § 58-37-40(A) on February 28, 2020. Certain interested parties have suggested that the Commission initiate a generic proceeding for the purpose of establishing guidelines to be used by the electric utilities in preparing and filing their IRPs prior to Commission review. However, the detailed and specific guidelines in S.C. Code Ann. § 58-37-40(B)(1) regarding IRPs to be filed by electrical utilities and the comprehensive procedure in S.C. Code Ann. § 58-37-40(C) by which the Commission, ORS, and other interested parties can review the proposed IRP and assess whether the utility has complied with the extensive statutory guidelines provide ample guidance to determine the sufficiency of IRPs filed by electrical utilities. As such, establishing a separate proceeding to establish further guidelines is neither required nor warranted by Act 62.

The Honorable Jocelyn G. Boyd
July 5, 2019
Page 4

Thank you for your assistance with this matter. If you have any questions or need anything further, please do not hesitate to contact me.

Very truly yours,



Matthew W. Gissendanner

MWG/kms

cc: Andrew Bateman, Esquire
Jeffrey M. Nelson, Esquire
Nanette S. Edwards, Esquire
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(all via electronic mail and **First Class U.S. Mail**)